

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Aaron J. Smith	:	
Debtor	:	Chapter 13
	:	
Loancare, LLC	:	Case No: 1:19-bk-00089-HWV
Moving Party	:	
	:	
v.	:	Answer to Motion for Relief
	:	
Aaron J. Smith	:	Relating to Docket # 28
Teresa D. Smith (non-filing co-debtor)	:	
Respondents	:	

**ANSWER TO MOTION OF LOANCARE, LLC FOR RELIEF FROM
AUTOMATIC STAY UNDER §362 AND CO-DEBTOR STAY UNDER §1301
PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001**

AND NOW, comes the Debtor, Aaron J. Smith by and through his attorney Kelly M. Walsh, Esq. and Scaringi Law, and files this answer to the Motion for Relief from Stay and avers as follows:

1. ADMITTED.
2. ADMITTED.
3. ADMITTED.
4. DENIED. Strict proof of this allegation is demanded at time of trial.
5. ADMITTED.
6. DENIED. Strict proof of this allegation is demanded at time of trial.
7. DENIED. Strict proof of this allegation is demanded at time of trial.
8. DENIED. Strict proof of this allegation is demanded at time of trial.
9. DENIED. Strict proof of this allegation is demanded at time of trial.

10. DENIED. Movant is already authorized to communicate with Debtor's counsel, and Debtor's counsel intends to reach out to Movant's Counsel to resolve this motion.

11. DENIED. Strict proof of this allegation is demanded at time of trial.

12. DENIED. Strict proof of this allegation is demanded at time of trial.

WHEREFORE, the debtor herein, respectfully prays that this Honorable Court deny the Motion for Relief from the Automatic Stay and Co-debtor Stay.

Respectfully Submitted:

Date: September 17, 2019

/s/ Kelly M. Walsh
Kelly M. Walsh, Esq.
Attorney ID# 320919
Scaringi Law
2000 Linglestown Road, Suite 106
Harrisburg, PA 17110
(717) 657-7770
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Deborah A. Black, Paralegal for Scaringi Law, do hereby certify that I have served to the parties listed below, a copy of the Debtors Answer to Motion for Relief from the Automatic Stay.

Service was accomplished by placing the same in the United States Mail, first class, postage prepaid and addressed as follows on the following:

Thomas Song, Esquire
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103

Aaron and Teresa Smith
6829 Shoestring Hill Road
PO Box 1
Quincy, PA 17247

Service was accomplished via ECF on the following:

Charles J. DeHart, III Esq.
Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Thomas Song, Esquire
Phelan Hallinan Diamond & Jones, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103

DATE: September 17, 2019

/s/ Deborah A. Black
Paralegal